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March 28, 2018

## Via ECF Filing

Honorable Alison J. Nathan United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007-1312

Re: Brian Fischler, Individually and on behalf of all other persons similarly situated v.

180 Tenth Hotel d/b/a The High Line Hotel

Case No. 1:18-cv-01983-AJN

**Unopposed Request to Extend Time to Respond to Plaintiff's Complaint** 

Dear Judge Nathan:

Defendant, 180 Tenth Hotel, d/b/a The High Line Hotel (the "Hotel"), requests an extension of time to respond to plaintiff's complaint through April 30, 2018. The current deadline to respond to the complaint is March 30, 2018.

On March 7, 2018, Plaintiff, Brian Fischler (plaintiff), served a summons and complaint on the Hotel in connection with this matter.

Undersigned counsel, however, requests additional time to review the file materials, conduct an investigation, and confer with his client in order to draft an appropriate responsive pleading. In addition, the extension will allow the parties the time necessary to engage in meaningful and good-faith settlement negotiations in hopes the parties can reach a mutually agreeable resolution without the Court's involvement.

Plaintiff, through counsel, has agreed to allow the Hotel an extension of time through and including April 30, 2018 to respond to the complaint.

Because the initial Pre-Trial Conference is not scheduled until June 29, 2018, this extension request will permit the Parties to focus on settlement of the case during this time.

Respectfully submitted,

/s/: Aaron Easley
Counsel for Defendant

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## **CERTIFICATE OF SERVICE**

I certify that on this 28<sup>th</sup> day of March 2018, a copy of the foregoing was sent to the parties of record including Plaintiffs' counsel as described below via ECF filing.

Douglas B. Lipsky, Esquire 630 Third Avenue, 5th floor New York, NY 10017 doug@lipskylowe.com

> /s/: <u>Aaron Easley</u> Counsel for Defendant